

1 JENNER & BLOCK LLP  
2 Reid J. Schar (*pro hac vice*)  
3 RSchar@jenner.com  
4 353 N. Clark Street  
5 Chicago, IL 60654-3456  
6 Telephone: +1 312 222 9350  
7 Facsimile: +1 312 527 0484

8 CLARENCE DYER & COHEN LLP  
9 Kate Dyer (Bar No. 171891)  
10 kdyer@clarencedyer.com  
11 899 Ellis Street  
12 San Francisco, CA 94109-7807  
13 Telephone: +1 415 749 1800  
14 Facsimile: +1 415 749 1694

15 CRAVATH, SWAINE & MOORE LLP  
16 Kevin J. Orsini (*pro hac vice*)  
17 korsini@cravath.com  
18 825 Eighth Avenue  
19 New York, NY 10019  
20 Telephone: +1 212 474 1000  
21 Facsimile: +1 212 474 3700

22 Attorneys for Defendant PACIFIC GAS AND ELECTRIC  
23 COMPANY

24 UNITED STATES DISTRICT COURT  
25 NORTHERN DISTRICT OF CALIFORNIA  
26 SAN FRANCISCO DIVISION

27 UNITED STATES OF AMERICA,

28 Case No. 14-CR-00175-WHA

Plaintiff,

**FURTHER SUBMISSION IN  
RESPONSE TO QUESTION 7 IN  
FOLLOW-UP QUESTIONS RE DIXIE  
AND FLY FIRES**

v.

PACIFIC GAS AND ELECTRIC COMPANY,

Judge: Hon. William Alsup

Defendant.

1           Defendant Pacific Gas and Electric Company (“PG&E”) respectfully submits this  
 2 further submission in response to Question 7 in the Court’s August 17, 2021 order (Dkt. 1417).

3           **Question 7:**

4           Please provide copies of all reports and memos and emails regarding the site visit on  
 5 April 16, 2021, regarding the plan for under-grounding the circuit and all reports and  
 6 memos and emails summarizing, describing or referring to the need to do so or the  
 proposal to do so or the problem leading to such proposals.

7           **PG&E Further Response:**

8           Consistent with PG&E’s August 31, 2021 submission, PG&E delivered to the Court  
 9 on August 31, 2021 a thumb drive containing electronic copies of 2,044 documents bearing Bates  
 10 PGE-DIXIE-NDCAL-0000001 to PGE-DIXIE-NDCAL-000008582 that PG&E has identified as  
 11 responsive to this request. PG&E is making its additional production described in the August 31,  
 12 2021 submission by delivering to the Court on September 3, 2021 a second thumb drive containing  
 13 2,054 documents that PG&E has identified as responsive to this request bearing Bates PGE-DIXIE-  
 14 NDCAL-000008583 to PGE-DIXIE-NDCAL-000017010.<sup>1</sup> PG&E is also producing additional  
 15 documents identified as relating to the system hardening project for the Bucks Creek 1101  
 16 distribution circuit approved by the Wildfire Risk Governance Steering Committee in January 2021  
 17 (the “Bucks Creek 1101 System Hardening Project”). The second thumb drive includes indexes  
 18 identifying the Bates range for each document family in the August 31, 2021 and September 3, 2021  
 19 productions.

20           Together with various PowerPoint presentations, PG&E is producing approximately  
 21 1,000 embedded Excel files containing data related to graphs and charts in those presentations. If  
 22 the Court prefers, PG&E can produce an alternative set of the documents without the embedded  
 23 Excel files.

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 25           <sup>1</sup> As set forth in PG&E’s August 31, 2021 submission, PG&E does not interpret the Court’s  
 26 question as calling for information protected by the attorney-client privilege or attorney work  
 27 product protection. Where applicable, PG&E is redacting portions of documents determined to be  
 protected by attorney-client privilege or to constitute attorney work product.

1 As set forth in PG&E's August 31, 2021 submission, certain documents being  
2 provided to the Court contain personally identifying information and other confidential information.  
3 PG&E is in the process of identifying this confidential information and will prepare and deliver a  
4 redacted set and file a corresponding administrative motion to seal.

5  
6 Dated: September 3, 2021

Respectfully Submitted,

7 JENNER & BLOCK LLP  
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9 By: /s/ Reid J. Schar  
10 Reid J. Schar (*pro hac vice*)  
11

12 CRAVATH, SWAINE & MOORE LLP  
13

14 By: /s/ Kevin J. Orsini  
15 Kevin J. Orsini (*pro hac vice*)  
16

CLARENCE DYER & COHEN LLP  
17

18 By: /s/ Kate Dyer  
19 Kate Dyer (Bar No. 171891)  
20

21 Attorneys for Defendant PACIFIC GAS AND  
22 ELECTRIC COMPANY  
23